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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et. al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et. al.*,

Defendants.

Case No. 3:25-cv-1766-EMC

Judge: Hon. Edward M. Chen

DECLARATION OF KATELAND JACKSON

DECLARATION OF KATELAND JACKSON
No. 3:25-cv-1766-EMC

1 I, Kateland Jackson, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

2 1. I am the Chief of Staff at the Office of General Counsel within the Department of
3 Homeland Security (“DHS”). As the Chief of Staff, I supervise attorneys and other professional staff
4 who are coordinating efforts at DHS Headquarters (DHS HQ) to respond to court orders and discovery
5 requests in this case, as well as in other litigation in which DHS HQ is a party or has equities. The facts
6 set forth herein are of my own personal knowledge.

7 2. As a threshold issue, the Office for the Chief Information Officer, who is responsible for
8 DHS technology and systems, confirmed that searching OneDrive is synonymous with searching
9 employees’ hard drives—i.e., everything saved on an employee’s hard drive is automatically saved to
10 OneDrive.

11 3. The following court-ordered custodians are current employees of DHS: Deputy Secretary
12 Edgar, Troup Hemenway, Benjamine C. Huffman, Joseph Guy, Robert Law, Corey Lewandowski,
13 Joseph Mazzara, Secretary Noem, Jimmy Percival. The employees were asked whether they used:
14 personal email, messaging on a personal phone, or messaging on a work phone with respect to the TPS
15 decisions at issue in this litigation.

16 a. Mr. Huffman responded, no, to the best of his information and recollection.

17 b. Mr. Percival, Mr. Law, and Mr. Mazzara responded, no.

18 c. Mr. Hemenway and Mr. Guy do not use their personal devices for work purposes and
19 have no recollection of deviating from that practice here. They similarly, to their best recollection and
20 belief, did not use text messaging applications on their work phones.

21 d. I have not yet been able to personally discuss this issue with the Secretary, Deputy
22 Secretary, and Corey Lewandowski, but my understanding based on what was relayed to me by those
23 who discussed this with them is that they do not use their personal devices for work purposes and have
24 no recollection of deviating from that practice here. They similarly, to their best recollection and belief,
25 did not use text messaging applications on their work phones.
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Executed at Washington, D.C. on this 5th day of June, 2025.

Kateland Jackson
Chief of Staff
Office of the General Counsel
U.S. Department of Homeland Security